

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

REBECCA KLYMN,
Plaintiff,

vs.

MATTHEW ROSENBAUM,
MONROE COUNTY SUPREME COURT,
UNIFIED COURT SYSTEM of the STATE
OF NEW YORK, OFFICE of COURT
ADMINISTRATION, OFFICE of the MANAGING
INSPECTOR GENERAL for BIAS MATTERS,
COSMAS GRANT, RONALD PAWELECZAK,
ANN MARIE TADDEO, CAROLYN GRIMALDI,
MARGARET ALLEN, and AMY FIELDS,
Defendants.

21-CV-6488-JLS-LGF

NOTICE OF MOTION FOR
PERMISSION TO CONDUCT
LIMITED PRE-ANSWER
DISCOVERY

PLEASE TAKE NOTICE, hereby given, that upon the Affirmation of Anna Marie Richmond, together with exhibits filed therewith, Plaintiff will move this Court, at a date and time to be set by the Court, for an Order pursuant to Fed. R. Civ. P. 26(d)(1), permitting Plaintiff to serve limited pre-answer discovery pursuant to Fed. R. Civ. P. 34 upon the Defendants herein.

PLEASE TAKE FURTHER NOTICE that Plaintiff intends to serve reply papers.

Dated: September 18, 2023

/s/ Lindy Korn
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To: David Nocenti, Counsel

David Rothenberg, Esq. and

Office of Court Administration
Pedro Morales, Esq., of Counsel
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Supreme Court, New York State Unified
Court System, Office of Court Administration,
and Office of the Managing Inspector General
for Bias Matters

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Pawelczak, Taddeo, Grimald, Allen,
and Fields.